

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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WAI HOE LIEW A/K/A MICHAEL W. LIEW,	:
KHURRAM KAYANI, AND ELIZABETH K. ATWOOD	: Case No.
A/K/A ELIZABETH KING,	: 1:14-cv-04868-KAM-MDG
	:
Plaintiff,	:
-against-	: AFFIRMATION OF JOSEPH
	: L. FRANCOEUR IN
COHEN & SLAMOWITZ, LLP, MITCHELL SELIP,	: SUPPORT OF DEFENDANTS'
MITCHELL G. SLAMOWITZ, and DAVID A. COHEN,	: MOTION TO DISQUALIFY
	:
Defendants.	:
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Joseph L. Francoeur, an attorney duly admitted to practice law in the courts of the State of New York, affirms the following under penalties of perjury:

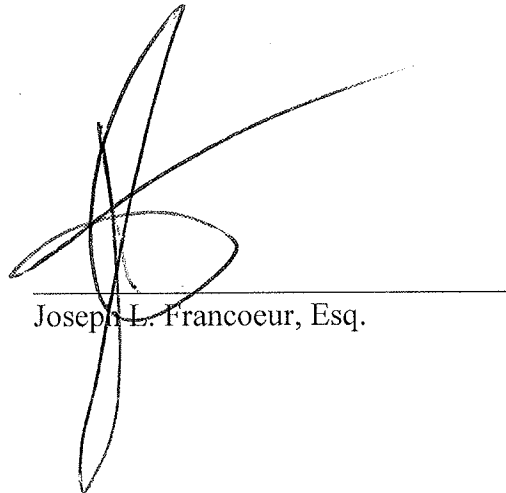
1. I am a member of the law firm of Wilson, Elser, Moskowitz, Edelman & Dicker, LLP, attorneys for the defendants, COHEN & SLAMOWITZ, LLP, MITCHELL SELIP, MITCHELL G. SLAMOWITZ, and DAVID A. COHEN and I am fully familiar with the facts and circumstances of the within action by virtue of my review of the file maintained by this office.
2. Annexed hereto as Exhibit A is a true and accurate copy of Plaintiff's Class Action Complaint and Demand for Trial by Jury dated and filed August 15, 2014.
3. Annexed hereto as Exhibit B is a true and accurate copy of Mitchell Pashkin's letter to this Court filed November 11, 2014.
4. Annexed hereto as Exhibit C is a true and accurate copy of Mitchell Pashkin's CV filed with this Court filed September 10, 2014.

5. Annexed hereto as Exhibit D is a true and accurate copy of Formal Opinion 99-415 of the ABA Standing Committee on Ethics and Professional Responsibility: Representation Adverse to Organization by Former In-House Lawyer.

6. The exhibits support a disqualification of Plaintiff's counsel, Mitchell Pashkin, because the Pashkin is facing a former client in this litigation in violation of Ethical Rules and the law of this Court.

WHEREFORE, defendants, COHEN & SLAMOWITZ, LLP, MITCHELL SELIP, MITCHELL G. SLAMOWITZ, and DAVID A. COHEN, respectfully request that this Court grant this motion to disqualify Plaintiff's attorney as counsel and further relief as the Court may deem just and proper.

Dated: December 08, 2014
New York, New York



Joseph L. Francoeur, Esq.